

POLREP DISTRIBUTION LIST

POLREP NO. 10

DATE: October 17, 1989

Site Name: #95 West Bank of the Merrimack River, Nashua, NH

- National Response Center (G-TGC-2)
U.S. Coast Guard - Room 2611
2100 Second Street, S.W.
Washington, DC 20593



SDMS DocID 270175

- U.S. Environmental Protection Agency
Emergency Response Division (WH-548-B)
401 M Street, S.W.
Washington, DC 20460
Attention: David Lopez

U.S. EPA BOSTON - JFK Building

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- Brooke Cook, Office of Public Awareness (RPA-2203)
- Merrill S. Hohman, Director, Waste Mgt Division (HAA-CANZ)
- Stephen Ells, Office for Congressional Affairs (RGR-2203)
- Roger Duhamel, Office of Inspector General (OIG-I)
- Pam Hill, esq., Office of Regional Counsel (RRC-2203)

U.S. EPA - Environmental Service Division

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Site Name: West Bank
Date: 13 October 1989
Subject: POLREP #10 - Removal Action
Location: Site #95
West Bank of the Merrimack River
Nashua, New Hampshire
Pollutant: Asbestos
Occurrence Date: 1960's
Environmental Media affected: Land, water, air
Severity: Potentially - Major
Quantity Discharged: Unknown
Category: Onshore/Non-transportation
Source: Dumping of asbestos waste
materials by Johns-Manville
Region: U.S. EPA Region I
Latest POLREP: POLREP 9 - February 10, 1989

U.S. ENVIRONMENTAL PROTECTION AGENCY

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Project Manager:

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I. Background:

The West Bank asbestos waste site is situated in Nashua, New Hampshire, along the Merrimack River (Tax map reference #24, lot #18). The site is located immediately downstream of Taylor's Fall Bridge on Route 101A, lying to the south of Hollis and Crown Streets. The property is owned by the City of Nashua, and is utilized by the U.S. Army Corps of Engineers (ACOE) as a flood control dike area. The site consists of a 25 foot slope extending approximately 1,000 feet along the west shore of the Merrimack River. Asbestos plate board, intermixed with baghouse waste, is fully and partially exposed from below the waterline to the top edge of the slope.

The removal action is being managed by the U.S. ACOE under an interagency agreement (IAG) with the U.S. Environmental Protection Agency (EPA). Two other sites in Nashua, New Hampshire are included in the same U.S. ACOE asbestos abatement project solicitation # DCAW33-89-B-0010. These other two sites, referred to as the Pine/Nowell Street and Oakland Street sites, are being documented in separate pollution reports.

II. Actions Taken:

- Feb 07, 1989 - Bids Closing/Opening at 1400 hours
Location: U.S. ACOE Building 111
424 Trapello Road, Waltham, MA
- May 04, 1989 - Removal contract awarded to R. Zoppo Company, Inc., of Avon, Massachusetts.
- Jun 01, 1989 - OSC met with Nashua, New Hampshire official to review landfill disposal agreements.
- Jun 13, 1989 - OSC attended on-site preconstruction meeting with ACOE personnel and Zoppo Construction Co. representative to review upcoming site activities.
- Jul 17, 1989 - Construction began at the Pine/Nowell Site in Nashua. OSC met with local community officials to inform them of upcoming activities at West Bank and other sites.
- Aug 28, 1989 - ACOE requested extension of IAG to extend IAG Project/Budget period from 8/30/89 to 7/31/90.
- ACOE and Zoppo conducted a preparatory inspection for clearing of West Bank Site. Industrial hygienist from Cashins Associates (hired by Zoppo) is on-site. Preabatement air sampling conducted by industrial hygienist to determine background air quality.
- Sep 6, 1989 - "Press Day" held at the West Bank Site for government officials and the media. Persons present included U.S. EPA Deputy Regional Administrator, Paul G. Keough; City of Nashua Mayor, James W. Donchess; Special Assistant to the Mayor, Joseph Freeman; U.S. ACOE Chief of Construction Division, Dick Carlson; U.S. ACOE Project Manager, Tony Riccio; U.S. ACOE Project Engineer, Paul Battista; U.S. ACOE Public Affairs Officer, Sue Douglas; NH Department of Environmental Services (DES) Waste Management Engineer, Dan Speer; DES Public Information Coordinator, Chuck Knox; and other government representatives.

- Sep 14, 1989 - Decontamination trailer moved from Oakland Avenue Site to West Bank Site.
- Sep 15, 1989 - Barricade tape and warning signs posted. Access ramp over dike to construction area constructed.
- Sep 18, 1989 - OSC held safety meeting with ACOE and Zoppo to brief them on the new CERCLA regulation regarding OSHA and EPA responsibilities of hazardous waste sites. The regulation took effect on 9/23/89. Industrial hygienist began daily air monitoring program. Clearing and grubbing of the slope began. Stumps and root systems left undisturbed.
- Sep 19, 1989 - First batch of air sample results from 9/18/89 were received. Total fibers per cubic centimeter ranged from .00225 to .00783 on four samples. Total suspect fibers ranged from .00161 to .00336 F/cc. All sampling results were well below the 8 hour Time Weighted Average (TWA) for airborne concentrations of asbestos fibers to which any worker may be exposed. The 8 hour TWA is 0.2 F/cc.
- Sep 20, 1989 - Clearing continued. Gravel fill (soil) began to be placed over exposed asbestos on the slope. No asbestos or contaminated soils expected to be transported or disposed off site.
- Due to conflict in survey data an additional river bottom survey was required. Survey team hired by Zoppo arrived on-site and was briefed by ACOE representative. ACOE informed survey team they cannot enter the exclusion zone without the 40 hour OSHA training requirement. Surveyors tell ACOE they were not aware of contamination and left the site.
- Sep 21, 1989 - Clearing completed.
- Sep 25, 1989 - Asbestos caverns were covered with gravel fill.
- Sep 28, 1989 - OSC conducted site inspection. Additional river bottom survey conducted. Based on data from this river bottom survey, more fill required. Additional costs expected as a result.
- Sep 29, 1989 - Two TAT members conducted site inspection for the U.S. EPA. The toe of slope had begun to be constructed with stone bedding and rip rap on the northern end of the bank. Asbestos visible along the bank.

- Oct 03, 1989 - TAT member conducted site inspection for the U.S. EPA and met with ACOE and Zoppo Construction representative to discuss status and schedule of project. Construction expected to continue for four to six weeks. Water quality of the river did not appear to be adversely affected by construction activities.
- Oct 06, 1989 - TAT member conducted site inspection for the U.S. EPA. Visible baghouse wastes identified near the top of the slope toward the southern end of the bank. Based on conversation with OSC, Zoppo agreed to cover exposed material.
- Oct 10, 1989 - TAT member and OSC conducted site inspection. Additional gravel fill spread over exposed asbestos toward the southern end of the bank but baghouse and tile asbestos are still visible. The length of the dike was inspected for visible asbestos. Small fragments of asbestos observed along the dike, access ramp, and side of the paved road.
- Oct 13, 1989 - TAT member conducted site inspection for the U.S. EPA. Additional gravel fill spread over southern end and baghouse asbestos no longer visible. Small asbestos fragments still observed along dike, access ramp, and southern end of slope. Asbestos fragments on side of paved road were removed. Stone bedding and rip rap cover approximately one half of slope.

III. Future Actions:

The transition area (key) on the southern end is expected to be excavated in mid-November. Excavation area will be inspected for presence of asbestos to determine if asbestos may extend southward off-site.

- Continue to extend toe of slope with stone bedding and rip rap and cover slope with gravel fill.
- Top soil and seed slope.
- Rake and seed dike.
- Dismantle trailers and return site to original condition.

IV. Funding Status:

U.S. EPA obligated an additional \$100,000 to this site, increasing the TOTAL PROJECT CEILING TO \$750,000.

Financial Data:

DOCUMENT CONTROL NUMBER	ACCOUNT NUMBER	DOLLAR AMOUNT	COST ALLOCATION
Z30006	7QfA1ANE95	\$507,000	US Army COE
ER0028	8TFa1ANE95	\$100,000	US Army COE
		\$103,000	TAT
		\$ 40,000	Intramural
TOTAL PROJECT CEILING		\$750,000	

CASE PENDING:



Paul R. Groulx, On-Scene Coordinator

10/26/89
